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7 Attorneys for
 8 MACY'S WEST STORES, INC.

9
UNITED STATES DISTRICT COURT
 10 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

11
 12 GAYLE TURNER, et al.,,
 13 Plaintiff,
 14
 15 v.
 16 INNOVATIVE FACILITY
 SERVICES, LLC, et al.,,
 17 Defendant.

Case No. 14-cv-00544-BLF

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR DISCOVERY
 SCHEDULE**

The Hon. Beth Labson Freeman

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 19 Per Case Management Order dated May 22, 2014 and signed by the Hon.
 20 Beth Labson Freeman, the parties hereby stipulate to the following discovery
 21 schedule:

22 EVENT	DATE OR DEADLINE
23 Further Case Management Conference	
24 Mediation	09/23/2014
25 Last Day to Amend Pleadings or Add 26 Parties	11/28/2014
27 Last Day to Disclose Experts	11/28/2014
28 Fact Discovery Cut-Off	10/31/2014
Expert Discovery Cut-Off	11/28/2014
Last Day to Hear Dispositive Motions	01/30/2015
Final Pretrial Conference/Motions in	03/05/2015 at 2:30 pm

1 Limine	
2 Trial	03/16/2015 at 9:00 am

3 DATED: July 18, 2014

4 **MANNING & KASS**
5 **ELLROD, RAMIREZ, TRESTER LLP**

6 By: /s/David Roth

7 David Roth
8 Miriam Renzi
9 Attorneys for Defendant, MACY'S WEST
10 STORES, INC.

11 DATED: July 18, 2014

12 **DREYER, BABICH, BUCCOLA, WOOD,**
13 **CAMPORA, LLP**

14 By: /s/Joseph Yates

15 Joseph Yates
16 Attorneys for Plaintiff, GAYLE TURNER
17 and TOM TURNER

18 DATED: July 18, 2014

19 **WILSON, ELSE, MOSKOWITZ,**
20 **EDELMAN & DICKER, LLP**

21 By: /s/Eric Wong

22 Eric Wong
23 Attorneys for Defendant, INNOVATIVE
24 FACILITY SERVICES, LLC.

25 **MANNING & KASS**
26 **ELLROD, RAMIREZ, TRESTER LLP**
27 Attorneys for Plaintiff

1 **PROPOSED ORDER**

2 The parties' stipulation is adopted and IT IS SO ORDERED.
3 The parties' stipulation is modified as follows, and IT IS SO
4 ORDERED.

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7 Dated: July 21, 2014

Beth Labson Freeman
8 HONORABLE BETH LABSON FREEMAN

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MANNING & KASS
ELIARD, RAMIREZ, TRESTER LLP
ATTORNEYS FOR PLAINTIFF

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

3 At the time of service, I was over 18 years of age and not a party to this action. I am
4 employed in the County of San Francisco, State of California. My business address is 121 Spear
5 Street, Suite 200, San Francisco, CA 94105-1582.

6 On the date set forth below, I served true copies of the following document(s) described as
7 **STIPULATION AND [PROPOSED] ORDER FOR DISCOVERY SCHEDULE** on the
interested parties in this action as follows:

8 **SEE ATTACHED SERVICE LIST**

9 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the
10 persons at the addresses listed in the Service List and placed the envelope for collection and
11 mailing, following our ordinary business practices. I am readily familiar with the practice of
12 Manning & Kass, Ellrod, Ramirez, Trester LLP for collecting and processing correspondence for
13 mailing. On the same day that correspondence is placed for collection and mailing, it is deposited
14 in the ordinary course of business with the United States Postal Service, in a sealed envelope with
15 postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The
16 envelope was placed in the mail at San Francisco, California.

17 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the
18 document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case
19 who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case
20 who are not registered CM/ECF users will be served by mail or by other means permitted by the
21 court rules.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed on July 18, 2014, at San Francisco, California.

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Mary A. Trubiano

1 **SERVICE LIST**

2 **Gayle Turner v. Innovative Facility Services, Macy's West Stores, et al.**
3 Case No. 14-cv-00544-BLF 14-cv-00544

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